

June 1, 2017

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: **Starry, Inc. Notice of Ex-Parte Communication**; Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95; RM-11664; and WT Docket No. 10-112; and Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79

Dear Ms. Dortch:

On May 30, 2017, Starry, Inc., represented by Chet Kanojia, Chief Executive Officer and Virginia Lam Abrams, Senior Vice President of Communications & Government Relations, participated in a meeting at the Federal Communications Commission ("Commission") with Daudeline Meme, Legal Advisor, Wireless, International and Public Safety to FCC Commissioner Mignon Clyburn.

During the meeting, Starry briefed Ms. Meme on Starry's proprietary 5G fixed wireless technology and the company's deployment progress in Boston and other cities. Starry also reiterated its support for preserving commercial-to-commercial sharing in the lower 37 GHz band as proposed in the *Spectrum Frontiers Report & Order* and encouraged a timely issuance of the second *Report & Order* to unleash additional spectrum into the marketplace. Starry also reiterated its support for maintaining the aggregation limits as outlined in the initial *Report & Order*. Starry noted that speeding the time to market of new spectrum, coupled with enabling shared access to spectrum would quickly bring to market competitive broadband alternatives to consumers.

Starry also shared with Ms. Meme its belief that given the characteristics of this band and the potential for spectrum re-use, sharing in the lower 37 GHz band could be more easily facilitated via a simple site-based registration system to coordinate users, eliminating the need to utilize a third-party spectrum access management system in this band.

Ultimately, as the development of new 5G technologies continues, Starry believes that it is critical that the Commission employ a diverse set of licensing models to encourage the

maximum amount of innovation in these millimeter wave bands. Starry supports the Commission's balanced approach to spectrum licensing to include sharing, exclusively-licensed and unlicensed models. No one can predict with a certainty what technologies will emerge in the 5G evolution and moving towards an exclusively-licensed only model would effectively shut out new entrants into this space.

Additionally, Ms. Meme inquired whether Starry encountered any obstacles in its deployment regarding access networks or siting equipment. While Starry has not encountered any insurmountable obstacles to its deployment, these issues remain a concern for the company as it expands its operations. Starry indicated to Ms. Meme that it plans to submit comments in the Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment proceeding and will provide suggestions for areas where the FCC can help lower barriers to deployment and reduce construction friction at a local level.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets. We have also provided a copy of this letter electronically to all Commission personnel who were in attendance. Please contact the undersigned with any questions.

Respectfully submitted, Virginia Lam Abrams Starry, Inc.

cc:

Daudeline Meme